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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DAVINA WOODS, an individual,
Plaintiff,

vs.

COAST HOTELS AND CASINOS, INC. DBA
THE ORLEANS HOTEL AND CASINO; and
DOES 1-25, Inclusive,
Defendants.

Case No.: 2:24-cv-01235-GMN-BNW

STIPULATION AND ORDER TO HOLD
CORPORATE DESIGNEE
DEPOSITIONS AND FOR DEFENDANT
TO OBTAIN PLAINTIFF'S MEDICAL
RECORDS AND DISCLOSE THE SAME
AFTER THE CLOSE OF DISCOVERY

COME NOW Plaintiff, DAVINA WOODS, by and through her counsel of record, MICHAEL T. HUA, ESQ., and ANJAN GEWALI, ESQ., of MICHAEL T. HUA LAW, and Defendant, COAST HOTELS AND CASINOS, INC. DBA THE ORLEANS HOTEL AND CASINO, by and through their counsel of record, CHERYL H. WILSON, ESQ., and VICTORIA L. HIGHTOWER, of IVIE MCNEILL WYATT PURCELL & DIGGS, and hereby stipulate and agree that the Plaintiff be allowed to hold Corporate Designee Depositions, and for Defendant to obtain Plaintiff's Medical Records and Disclose the Same After the Close of Discovery, currently scheduled for June 1, 2025.

I. STATUS OF DISCOVERY EFFORTS TO DATE

The parties have conducted the following discovery to date:

1. The parties' initial disclosure statements have been exchanged pursuant to FRCP 26.1;
2. Defendants served four additional supplements to their disclosures pursuant to FRCP 26.1;

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- 1 3. Defendants propounded Interrogatories and Requests for Production on Plaintiffs, to which
- 2 Plaintiff's responded.
- 3 4. Plaintiffs propounded Interrogatories, Requests for Production on Defendant, to which they
- 4 responded.
- 5 5. Plaintiff DAVINA WOODS' Deposition was held on May 22, 2025.

6 **II. DISCOVERY REMAINING**

7 The following discovery remains to be completed:

- 8 1. Deposition of Defendant's FRCP 30(b)(6) Person Most Knowledgeable No. 1, Security,
- 9 scheduled for June 10, 2025, at 10:00 a.m.
- 10 2. Deposition of Defendant's FRCP 30(b)(6) Person Most Knowledgeable No. 2, Internal
- 11 Maintenance, scheduled for June 10, 2025, at 1:00 p.m.
- 12 3. Deposition of Defendant's FRCP 30(b)(6) Person Most Knowledgeable No. 3, Facilities,
- 13 scheduled for June 10, 2025, at 3:00 p.m.
- 14 4. Defendant has remaining medical records of Plaintiff's to request and disclose

15 **III. REASONS FOR REQUESTED EXTENSION**

16 The parties have been diligent in conducting written discovery, issuing subpoenas to collect
17 Plaintiff's relevant medical information, and beginning the deposition process. However, the parties submit
18 that good cause exists for the extension requested below for the following reasons:

19 Plaintiff set the depositions of three of Defendant's FRCP 30(b)(6) Person Most Knowledgeable
20 for June 10, 2025.

21 Plaintiff recently provided Defendant with additional authorizations to request records. We request
22 that Defendant be given time to request and disclose these records.

23 Parties are requesting this extension at this time so that parties can modify their plans and legal
24 strategy based upon the courts ruling. Requesting this extension at a later time could potentially preclude
25 the possibility of a ruling prior to the passing of important deadlines. Based on both counsel's experiences
26 with similar trucking cases, there is a strong likelihood that parties will require more time for scheduling
27 depositions, or sending follow up discovery questions.

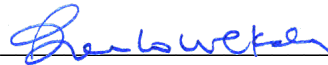
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IV. CURRENT DATES AND REQUESTED EXTENSIONS

Parties do not require an extension for expansive discovery. Parties only seek to extend discovery for the limited tasks and dates listed below:

1. Deposition of Defendant's FRCP 30(b)(6) Person Most Knowledgeable No. 1, Security, scheduled for June 10, 2025, at 10:00 a.m.
2. Deposition of Defendant's FRCP 30(b)(6) Person Most Knowledgeable No. 2, Internal Maintenance, scheduled for June 10, 2025, at 1:00 p.m.
3. Deposition of Defendant's FRCP 30(b)(6) Person Most Knowledgeable No. 3, Facilities, scheduled for June 10, 2025, at 3:00 p.m.
4. Defendant has remaining medical records of Plaintiff's to request and disclose, an allowance until June 13, 2025.

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: May 29, 2025

MICHAEL T. HUA LAW

/s/ Anjan Gewali
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Coast Hotels and Casinos, Inc. dba
The Orleans Hotel and Casino

CERTIFICATE OF SERVICE

Pursuant to FRCP 5, I hereby certify that I am an employee of MICHAEL T. HUA LAW and that on this 28th day of May 2025, I caused the foregoing **STIPULATION AND ORDER TO HOLD CORPORATE DESIGNEE DEPOSITIONS AND FOR DEFENDANT TO OBTAIN PLAINTIFF'S MEDICAL RECORDS AND DISCLOSE THE SAME AFTER THE CLOSE OF DISCOVERY** to be served as follows:

- ☒ via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk
- ☐ by placing a true and correct copy of the same to be deposited for mailing in the U.S. Mail at Las Vegas, Nevada, enclosed in a sealed envelope upon which first class postage was fully prepaid; and/or
- ☐ pursuant to EDCR 7.26, by sending it via facsimile; and/or
- ☐ by hand delivery

to the attorneys listed below:

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/s/ Ariana J. Dunbar
An employee of the MICHAEL T. HUA LAW